

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 by Eldon Insurance Services Limited and constitutes the Eldon Group's slavery and human trafficking statement for the current financial year. Future statements will be updated and published annually in line with our accounts.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business, including in our supply chains. We are resolved to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We have a Code of Ethics that everyone at Eldon is required to display and we expect our partners and suppliers to adopt. These values include being fair to everyone who works for us and with us.

1. ORGANISATIONAL STRUCTURE

Eldon Insurance Services Limited is part of the Eldon group of companies. Its ultimate parent company is ICS Risk Solutions Limited, a company registered in the Isle of Man. ICS is a holding company which does not trade and therefore is not regulated.

Eldon and its subsidiaries have over 500 employees in the UK.

Eldon Insurance Services Limited is an insurance broker and claims manager, authorised and regulated by the Financial Conduct Authority:

- As an independent insurance broker, we search a panel of insurers - including our partners, Southern Rock Insurance Company Limited and Somerset Bridge Limited – to find the best deal to suit each customer's needs. Car insurance and home insurance policies are sold under the brand names, **Go Skippy**, **Vavista** and **Debenhams**. By offering the policyholder a quality service that is focused on customer needs, we value and keep our customers.
- As an insurance claims manager, we manage claims proactively, both for policyholder and insurer, settling claims efficiently and cost effectively. We minimise the cost of claims for our insurer partners, whilst delivering a quality service to policyholders.

Business Choice Direct Insurance is a subsidiary of Eldon which specialises in insurance products for the transport and construction industry and is based in Southampton. Through Business Choice Direct we offer a wide range of insurance products to Retail, Office, Licenced Trade, Professional Indemnity, Residential and Commercial Landlords. We have specialist schemes for Public & Employers Liability focused on Tradesman (including 'High Risk' trades) and Professionals. We cater for the needs of couriers, hauliers or fleet operator driving cars, vans as well as HGV's. **Footprint Insurance** is a trading arm providing van and bike insurance.

2. KEY PARTNERS AND SUPPLY CHAIN

Eldon works with several key partners and suppliers:

Debenhams are a leading international, multi-channel brand with a proud British heritage, which trades out of over 240 stores across 27 countries. Eldon provides customers with insurance policies using the Debenhams brand. Debenhams publish their own Modern Slavery Statement which can be found at <http://sustainability.debenhamsplc.com/wp-content/uploads/Final-ch-11-07-10-16.-Debenhams-Modern-Slavery-Statement-2016-Copy-2.pdf>.

Outworx handles the policy administration for many of our brands in South Africa. These include Go Skippy, Vavista and Debenhams. Outworx ensure that we have the knowledgeable, customer-

focused staff in place to support the administration of our customer policies. Outworx has over 400 employees in South Africa. Their values include employee transparency, accountability, respect, trust and collaboration.

Southern Rock Insurance Company Limited is a regulated insurer based in Gibraltar which underwrites insurance policies in the UK, including underwriting Go Skippy insurance policies sold by Eldon. Growth in motor insurance has been rapid since its launch in 2004, with a range of niche motor insurance products being developed.

Somerset Bridge Limited is a managing general agent and distributes insurance policies as an underwriting company via Eldon.

Legal Protection Group Limited is an appointed representative of Eldon and a specialist provider of Before-the-Event and After-the-Event legal protection insurance.

Vavista Life Limited is an appointed representative of Eldon and sells life and health insurance policies. It also provides innovative corporate wellness programmes which help companies to minimise the impact of absenteeism, presenteeism and occupational health issues through increased staff health and motivation.

As well these key partners, the Eldon group works with a number of major insurers in the UK, who are members of its panel.

3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have implemented internal policies to ensure compliance with legislation and best practice, including the following:

- Abusive and Unacceptable Behaviour Policy
- Anti-harassment and Bullying Policy
- Equality and Diversity Policy
- Treating Customers Fairly Policy
- Code of Ethics
- Anti Bribery and Corruption
- Values and Behaviours
- Health & Safety Policy
- Whistleblowing Policy
- Recruitment checks - Employment References and checks

These policies encourage ethical behaviour and respect for human rights throughout our organisation and supply chain.

Policy compliance is monitored by our HR, Risk, Compliance and Legal teams with oversight by the senior management team and the Board.

4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We conduct ongoing due diligence on our panel of insurers, including Southern Rock and Somerset Bridge, which is reviewed by our Audit Risk and Compliance Committee.

We work closely with Outworx, with directly employed staff working in their offices in South Africa, and our senior management regularly attending their offices to audit compliance with policies and processes.

We have in place systems for staff to report any concerns and to protect whistle blowers.

As part of our ongoing compliance and risk monitoring exercises, both internally within the group and in relation to monitoring third parties, we are developing key indicators to identify and assess areas of potential risk in our supply chains. We can take steps to mitigate any risk of slavery and human trafficking occurring in our supply chains and monitor on an ongoing basis.

5. SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking and we expect the same approach from all of our partners and suppliers. We encourage our partners and suppliers to take the same ethical approach to business as we do. We include provisions in our key contracts that our partners and suppliers should adhere to our policies.

6. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we now provide our staff with access to www.antislavery.org so they understand the key provisions of the Modern Slavery Act, how to recognise slavery practices and report them to the police or local enforcement bodies. This includes making employees aware of the Modern Slavery Helpline (telephone number: 0800 0121 700).

7. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

As a regulated business, we maintain a high standard of risk management, auditing and compliance monitoring in order to protect our customers. We apply the same standards to ensuring that we conduct business ethically, including combating slavery and human trafficking.

As part of our ongoing process for improving our standards and controls, we are reviewing the key performance indicators (KPIs) that we can use to measure how effective we are in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

We are also reviewing whether we can improve aspects of our supplier due diligence that address human rights issues such as slavery and human trafficking. We will look to bolster contractual obligations where appropriate to reinforce ethical behaviour throughout our supply chain.

Approved by: **Elizabeth Bilney**, CEO, Eldon Insurance Services Limited